

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED  
UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT 2016 APR 29 AM 11:16

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UNITED STATES OF AMERICA

V

DOCKET NO. 2:16-Cr-19

JAIDEN PAIGE,  
Defendant

**DEFENDANT'S MOTION FOR REVIEW OF DETENTION AND  
IMPOSITION OF CONDITIONS OF RELEASE**

NOW COMES the defendant by and through his attorney, Lamar Enzor, Esq., and pursuant to 18 U.S.C. Sec. 1835, hereby requests that this honorable court hold a hearing to review the detention order issued in this case. In support hereof, the defendant respectfully submits that his attorney agreed to a detention order when he first appeared in the United States District Court. The defendant had wanted to request a detention hearing. Pursuant to 18 U.S.C. Sec. 1835 either party can request a review of a detention order. The defendant respectfully submits that there are conditions or a combination of conditions that the court could impose that would reasonably assure his appearance for future hearings and protect the community. In further support, the defendant submits the following memorandum.

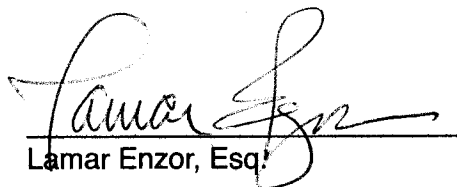
**MEMORANDUM**

This court has authority to review an order of detention and set appropriate conditions of release pursuant to 18 U.S.C. Sec. 3142(c) and (g); 18 U.S.C. 3142 et seq. The primary purpose of the act is to discourage the use of high bail for purposes of pretrial detention, and to provide the court with flexible alternatives to high bail. U.S. v Orta, 760 F.2d 887, 890 (8th Cir. 1985). Under 18 U.S.C. 3142(b) the defendant shall be released on conditions of release or personal recognizance unless the defendant presents a serious risk of flight or a serious danger to the community. The defendant respectfully contends that he presents neither of those

particular concerns. Defendant requests that a hearing be scheduled to allow him the opportunity to present further argument and evidence in support of his release on conditions.

WHEREFORE, the defendant respectfully requests that this honorable court conduct a hearing to review the order of detention in this case.

Dated this 25th day of April, 2016.



Lamar Enzor, Esq.

Cc: Michael Drescher, AUSA